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10 *Attorney for Defendants*
11 FACEBOOK, INC. and
12 MARK ZUCKERBERG
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CHILDREN'S HEALTH DEFENSE,

Plaintiff,

v.

FACEBOOK, INC., ET AL.,

Defendants.

Case No. 3:20-cv-05787-SI

**DECLARATION OF SONAL N.
MEHTA IN SUPPORT OF CIVIL
LOCAL RULE 6-2(A) STIPULATION**

1 I, Sonal N. Mehta, declare as follows:

2 1. I am a partner at Wilmer Cutler Pickering Hale and Dorr LLP. I represent Defendants
3 Facebook, Inc. and Mark Zuckerberg in the above-captioned action.

4 2. Defendants Facebook, Inc., Mark Zuckerberg, The Poynter Institute for Media
5 Studies, Inc. and PolitiFact have sought an enlargement of time to respond to Plaintiff's Complaint.

6 3. On September 4, I spoke with counsel for Plaintiff (and counsel for The Poynter
7 Institute for Media Studies, Inc. and PolitiFact) to request Plaintiff's agreement for an extension of
8 time for Facebook's response to the Complaint, which based on the alleged service date, would be
9 due on September 9. I explained that my firm had just been retained for this matter the preceding
10 evening. Counsel for Plaintiff agreed that Plaintiff would consent to an extension of time to respond
11 up to and including October 23, 2020 and requested a reciprocal extension of time up to and
12 including December 7, 2020 for Plaintiff to oppose any motion to dismiss that may be filed.

13 4. On September 8, following the Labor Day holiday weekend, I sent counsel for
14 Plaintiff a draft stipulation memorializing the October 23 and December 7 dates, and proposing that
15 Defendants file their replies in support of any Rule 12 motions by January 7, 2021 due to the
16 intervening winter holidays.

17 5. On September 9, counsel for Plaintiff requested an additional 14-day extension of
18 time for Plaintiff's response to any Rule 12 motions, i.e., to December 21. Counsel for Plaintiff
19 proposed a schedule whereby Plaintiff's Opposition to any Rule 12 motions be due December 21,
20 2020, and Defendants' Replies in support of any such motions be due January 21, 2021.

21 6. The time for Defendants to answer, move, or otherwise respond to the complaint has
22 been enlarged once by stipulation filed concurrently herewith, from September 9 to October 23,
23 2020 for Defendants Facebook, Inc., Mark Zuckerberg, and The Poynter Institute for Media Studies,
24 Inc., and from September 17 to October 23, 2020 for Defendant PolitiFact.

25 7. Defendants do not oppose Plaintiff's request for an enlargement of time to December
26 21 to respond to any Rule 12 motions.

27 8. Should the Court grant that extension, Defendants request an enlargement of time to
28 January 21, 2021 for Defendants to file replies in support of any Rule 12 motions. The additional

1 time is warranted because the winter holidays fall within the time allotted for Defendants to
2 prepare their replies, and in view of the complicated subject matter of this case, the number of
3 issues in dispute, and the need to coordinate among multiple, separately represented defendants.
4 The Complaint includes several alleged constitutional and statutory violations. This proposed
5 schedule will allow the parties adequate time to study the issues and submit briefing that will aid
6 the Court in its resolution of any Rule 12 motions.

7

8 I declare under penalty of perjury that the foregoing is true and correct.

9 Executed on this 9th day of September 2020 in Redwood City, California.

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By: /s/ Sonal N. Mehta
12 Sonal N. Mehta

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